District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 8C 3125 Martin Luther King Jr. Avenue SE Washington DC 20032

RE: Advisory Neighborhood Commission 8C Comprehensive Plan Resolution

Dear Commissioners Austin, Evans, Woodland, Pixley, Abdul-Salaam, Edwards-Hines, and Adofo:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community and reaffirmed policies that were not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 8C, marked as "Yes" were integrated into the Mayor's Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as "Support. No integration needed".

During OP's review, numerous recommendations received from ANC 8C were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as "Acknowledged" in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.



Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as "No" in the public review digest, and more appropriate programs or agencies have been identified.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment. Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District's growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document's scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District's physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15, 2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 8C-1	2.14	EDU-1.1.6	Education Facilities	Page 14 EDU-1.16. Fine and performing arts should be specifically referenced in this element, as it is written "cultural" could be loosely interpreted.	01-Yes	Clarifying language provided in the Arts and Culture Element.
ANC 8C-2	2.14		Education Facilities	Add element related to distance students to travel to access educational facilities.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies. A cross reference was added to the Transportation Element.
ANC 8C-3	2.14	EDU-1.1.B	Education Facilities	Page 15 EDU-1.1.B Remove this policy or add additional language to define partnerships and rationale for providing space to selected organizations.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; See Policy EDU-1.2.3: Developer Proffers for DCPS Facility Needs and Policy EDU-1.3.3: Developer Proffers for Public Charter School Facility Needs.
ANC 8C-4	2.14	1209.4	Education Facilities	Keep element 1209.4. It supports the community schools model that is currently being implemented by DCPS, specifically in Anacostia and Ballou High Schools which are educational pillars of Ward 8.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; This discussion has been relocated to the section's introduction, which is accompanied by a new map.
ANC 8C-5	2.14		Education Facilities	Current Proposed Language "NEW Across Washington, DC, school facilities and grounds serve as community assets by providing recreational space, meeting space, and more. As part of the facility modernization planning process, DCPS will continue to engage communities on how modernized facilities and grounds could better serve the needs of the surrounding communities and improve quality of life." (Educational Facilities; p. 9) Recommendation: Clearly define community engagement to include DCPS' Office of Community Engagement and ANC within this element.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; This comment is addressed by policies EDU 2.2.3 Community Participation, EDU-2.1.3 Community Use, EDU-2.1.5 Shared Use of Public Parks and Recreation Space for Public Schools.
ANC 8C-6	2.14	1808.12	Far Southeast and Southwest	Current Proposed Language: "1808.12 Policy FSS-1.1.11 Workforce Development Centers Support the development of additional vocational schools, job training facilities, and workforce development centers. ADD consider co-locating these programs within school settings where appropriate, including the Infrastructure Academy. Encourage the retention of existing job training centers, and the development of new centers on such sites as the St. Elizabeths Campus and DC Village to increase employment opportunities to local residents." Recommendation: In favor of the intent of this element; however propose language to be added regarding the roles of schools in workforce development. There were also sentiments expressed regarding supporting established workforce development programs that have demonstrated successful results in training individuals in various vocations.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Economic Section Increasing Workforce Development Skills, and Action ED-4.2.L: Increase Access to On-The-Job Training and Workforce Development.

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ANC 8C-7	2.14	1808.14	Far Southeast and Southwest	Current Proposed Language: "1808.14 Strongly support the modernization of schools in the Far Southeast/ Southwest Planning Area. Plans for additional housing must be accompanied by a commitment to improving educational facilities to meet current and future needs, and recognition that education is among the community's highest priorities." Recommendation: In favor. It is recommended that modernization is defined for transparency. Add language related to housing developers within a certain proximity to a school contributing financially to school modernization efforts as defined. Lastly, policies/processes for community benefits agreements that relate to schools should be developed or provided to the public. Often developers allude to benefits for schools and other educational entities without following guidelines for distributing those funds or services. Additionally, CBAs related to public services should be easily accessible to the public on DC Planning's website for accountability purposes.	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; See Educational Facilities Element for policies related to private development and educational facilities. Examples include new language under ED Section 1202, and Policy EDU-1.2.3: Developer Proffers for DCPS Facility Needs. Additionally, the ED Element incorporates policies from the 2018 Master Planning Facilities which includes more detail on school modernization.
ANC 8C-8	2.14	EDU-4.1.7	Education Facilities	Proposed Language: "Coordinate with educational and business partners to Increase the availability of quality early education, child care, after school, and preschool programs for all residents, especially low and middle income households and families with children with disabilities through educational and business partnerships. (p. 43) Recommendation: In favor of the intent of this element; however more actionable and measurable language should be used. Remove the language that is striked through in the proposed language above.	04-No	Current language is sufficient and does not preclude regulatory action; The proposed language changes the intent, as the emphasis on coordination is a priority to achieve desired outcomes.
ANC 8C-9	2.14	1205.1	Education Facilities	Proposed Language 1205.1 Public charter schools provide another school choice for families with school age children. As of SY2016-17, 46 percent of all public school students were enrolled in public charter schools and the DC PCSB approved the conditional opening of three more public charter schools in SY2018-19. (Educational Facilities, p. 18) Recommendation: Include more recent numbers or a range of supporting statistics across several years to highlight trends in charter enrollment and programs.	04-No	Current language is sufficient and does not preclude regulatory action; Due to the Comp Plan's breadth, all data points are benchmarked to 2017 to facilitate a consistent basis for long-term cross-sector policy.
ANC 8C-10	2.14	N/A	Education Facilities	Proposed Language: NEW A School Improvement Team (SIT) Use the LSAT which is established at every DCPS school where a major capital project (to include modernization, school replacement, addition, renovation or remodeling) is scheduled within the next one to two fiscal years. The LSAT SIT includes parents, neighbors, and community members as well as DCPS and DGS staff. The LSAT SIT has several duties, including providing feedback during the development of education specifications and schematic design and assisting with disseminating information about the progress of the school improvement to constituencies and peers represented on the LSAT SIT. Team members are also expected to consult on issues that arise during construction, be available to receive updates, and serve on the SIT through the end of construction. (p. 9) Recommendation: The school improvement team (SIT) is removed and the Local School Advisory Team (LSAT) should serve in this role for DCPS. Per the DCPS website, LSATs are groups of elected and appointed members that exist in every DCPS school. The team consists of parents, teachers, non-instructional school staff, a community member, and in some cases students, to advise the principal on matters that promote high expectations and high achievement for all students. In effort to reduce the number of groups that staff have to be dedicated to it is recommended that the LSAT absorb responsibility of approving development plans in addition to any DGS and necessary project staff.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; School Improvement Teams are specific to capital projects.

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ANC 8C-11	2.14	1204.7	Education Facilities	Proposed Language "MOVED Policy EDU-1.21.23: Co-Location of Charter and DCPS Schools Support efforts to co-locate public Charter Schools within significantly underutilized DCPS facilities. Address Ensure that parking, traffic, noise, needs for green open space and recreational facilities, and other impacts associated with increased enrollment and space utilization are addressed when co-location occurs. 1204.7." (Educational Facilities, p. 14) Recommendation: Include language related to co-locating schools with similar age/grade ranges to ensure the environment is developmentally appropriate. Additionally include language related to the programs having complimentary educational philosophies.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The 2018 Master Facilities Plan, included by reference, addresses co-location in more detail.
ANC 8C-12	2.14	EDU-4.1.7	Education Facilities	Proposed Language NEW Policy EDU-4.1.7: Partnerships Explore Implement collaborations with educational and business partners that can help to increase the availability of quality early childhood education, child development, after-school and pre-school programs for all residents, especially low-and middle-income households, and families with children with disabilities. Recommendation: Begin this element with the work "implement" to make it actionable and measurable.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Language is consistent with the format for the Comprehensive Plan, which is a guidance document.
ANC 8C-13	2.14		Education Facilities	Change all uses of the word "cultural" to "multicultural".	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Language is consistent with the format for all elements of the Comprehensive Plan.